

## EXHIBIT 8

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**From:** Edward Chin <echin@davisfirm.com>  
**Sent:** Tuesday, August 18, 2020 4:31 PM  
**To:** Corbett, Christine  
**Cc:** uniloc088\_apple; Apple-Uniloc-DLA  
**Subject:** Re: Uniloc/Apple (-532): Correspondence to B.Davis

[EXTERNAL]

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Christine,

Uniloc disagrees with Apple's position as stated in your letter dated August 18, 2020 concerning Uniloc 2017's Second Set of Interrogatories (Nos. 12-20) and Second Set of Requests for Production (Nos. 44-56) and will not be withdrawing any of the discovery requests. Uniloc's interrogatories and requests for production are neither improper nor exceed the number allowed by the Order Governing Proceedings ("OGP"). In fact, Apple should expect to receive additional interrogatories and requests for production from Uniloc during the remaining discovery period until the numerical limits set forth in the OGP are met. Apple's ongoing efforts to block Uniloc from obtaining relevant information and documents responsive to reasonable discovery requests, particularly as to relevant documents that Apple has produced, even voluntarily, in prior cases, is wholly unreasonable.

Please let us know whether y'all are able to attend a lead-and-local meet-and-confer call concerning this issue on Tuesday at 11:00am Central. Your letter fails to identify which specific interrogatories and which specific requests for production Apple contends count as more than one interrogatory or request for production and the basis for Apple's contention. Please provide that information in advance of the call so that it can be more productive. If you have controlling case authority which supports Apple's position, please share that in advance of the call as well.

Until and unless Apple obtains an order from the Court relieving it from responding to this discovery, Uniloc fully expects Apple to respond to each interrogatory and each request for production in Uniloc's Second Set of Interrogatories (Nos. 12-20) and Second Set of Requests for Production (Nos. 44-56) by the response deadline.

**Ed Chin, Of Counsel**  
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On Aug 18, 2020, at 3:01 PM, Corbett, Christine <[christine.corbett@dlapiper.com](mailto:christine.corbett@dlapiper.com)> wrote:

Counsel, please see the attached letter.

Regards, Christine

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Partner

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<8.18.2020 Ltr to Bo Davis.pdf>